

Judge John C. Coughenour
Judge Michelle L. Peterson

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

GUILD MORTGAGE COMPANY LLC,

Plaintiff,

vs.

CROSSCOUNTRY MORTGAGE LLC,

Defendant.

Case No. 2:21-CV-01376-JCC-MLP

**DEFENDANT CROSSCOUNTRY
MORTGAGE, LLC'S AMENDED
CORPORATE DISCLOSURE
STATEMENT**

TO: CLERK OF THE COURT

AND TO: ALL PARTIES AND COUNSEL OF RECORD

Pursuant to Federal Rule of Civil Procedure 7.1 and Local Civil Rule 7.1, Defendant CrossCountry Mortgage, LLC ("CrossCountry") states that it is a limited liability company organized under the laws of the State of Delaware. No public company owns 10% or more of CrossCountry's stock.

As of October 8, 2021, and until June 6, 2022, CrossCountry's members were CrossCountry Holding Corp., an Ohio corporation with its principal place of business in Ohio, and Radcliff CCM I LLC, a Delaware limited liability company. As of June 6, 2022, CrossCountry Holding Corp. and Radcliff CCM I LLC became members of CrossCountry

DEFENDANT CROSSCOUNTRY MORTGAGE,
LLC'S AMENDED CORPORATE DISCLOSURE
STATEMENT, 2:21-CV-01376-JCC-MLP

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1 Holdco, LLC, a Delaware limited liability company, which simultaneously became the sole
2 member of CrossCountry.

3 The states in which the party and members identified above have been citizens from
4 October 8, 2021 through the present include Ohio and California.¹ Because CrossCountry's
5 citizenship depends on the citizenship of Radcliff CCM I LLC ("Radcliff"), which is an outside,
6 third-party investment vehicle, CrossCountry inquired with Radcliff, following the Court's Order
7 of September 19, 2022 (ECF No. 124), to ask for an identification of the states in which Radcliff
8 was a citizen as of October 8, 2021 through the present. Radcliff confirmed that, during such
9 time period, it has had citizenship in California and that it is informed and believes that it has not
10 been a citizen of Delaware. Radcliff declined to provide CrossCountry with any additional
11 information regarding Radcliff's citizenship. Otherwise, the information necessary to identify
12 the states in which Radcliff has been a citizen from October 8, 2021 through the present is not
13 within CrossCountry's possession, custody, or control.²

16 Dated: September 23, 2022

Respectfully submitted,

JONES DAY

s/ Michael A. Platt

Michael A. Platt, *Admitted Pro Hac Vice*

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22 ¹ CrossCountry first learned of its potential California citizenship during the week of July 18, 2022.

23 ² Based on an exchange between CrossCountry's counsel, Jones Day, and counsel for Radcliff on October 3, 2019,
24 Jones Day is aware that, as of that date, Radcliff had citizenship in Illinois, Maryland, New York, and Pennsylvania,
25 and was not a citizen of Delaware, New Jersey, or Virginia, but Jones Day does not know whether that information
26 was correct as of October 8, 2021. No one from CrossCountry was copied on that exchange. The first time Jones
Day forwarded that exchange to anyone at CrossCountry was on June 8, 2022, just a short time after Jones Day
learned that it would become co-counsel for CrossCountry in this action.

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s/ Benjamin J. Stone

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Counsel for Defendant
CrossCountry Mortgage, LLC

DECLARATION OF SERVICE

I hereby certify that on September 23, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

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Dated: September 23, 2022 at Seattle, Washington.

s/Hilton Platt
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